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Attorneys for Plaintiff
 VIRAL DRM LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

VIRAL DRM LLC,

Plaintiff,

v.

UONG SY THANH,

Defendant.

Case No.: 24-cv-00731-JSC

**PLAINTIFF'S NOTICE OF MOTION FOR
 DEFAULT JUDGMENT**

The Honorable Jacqueline Scott Corley

Date: October 3, 2024

Time: 10:00 a.m. PT

Courtroom: 8 – 19th Floor

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR RESPECTIVE COUNSEL
 OF RECORD:**

PLEASE TAKE NOTICE that Plaintiff VIRAL DRM LLC (“Plaintiff”), by and through its attorneys, hereby moves for an application for entry of default judgment against Defendant UONG SY THANH (“Thanh” or “Defendant”). This motion is scheduled on October 3, 2024 at 10:00 a.m. before the Honorable Jacqueline Scott Corley, in the San Francisco Courthouse, Courtroom 8, 19th Floor, at 450 Golden Gate Avenue, San Francisco, California 94102.

Plaintiff seeks entry of default judgment for Plaintiff's claims of copyright infringement, misrepresentation, and falsification of copyright management information against Thanh, an award

of damages pursuant to 17 U.S.C. §§ 504, 512(f) and 1203, and an injunction pursuant to 17 U.S.C. § 502 permanently enjoining Defendant from further infringement.

DATED: August 27, 2024

Respectfully submitted,

/s/ Matthew L. Rollin

MATTHEW L. ROLLIN

SRIPLAW, P.A.

Attorneys for Plaintiff Viral DRM LLC